

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
Miami Division**

PRESIDENT DONALD J. TRUMP, an individual,

Plaintiff,

v.

DOW JONES & COMPANY, INC. d/b/a THE WALL STREET JOURNAL, a Delaware corporation, NEWS CORPORATION, a Delaware corporation, KEITH RUPERT MURDOCH, an individual, ROBERT THOMSON, an individual, KHADEEJA SAFDAR, an individual, and JOSEPH PALAZZOLO, an individual,

Defendants.

Case No.: 1:25-cv-23232-DPG

**PLAINTIFF’S NOTICE OF FILING SUPPLEMENTAL AUTHORITY IN SUPPORT OF
HIS RESPONSE IN OPPOSITION TO DEFENDANTS’ MOTION TO DISMISS
WITH INCORPORATED MEMORANDUM OF LAW (D.E. 46) AND
RESPONSE IN OPPOSITION TO DEFENDANTS’
REQUEST FOR JUDICIAL NOTICE (D.E. 47)**

Plaintiff President Donald J. Trump (“Plaintiff” or “President Trump”), by and through undersigned counsel, files this Notice of Filing Supplemental Authority In Support of His Response in Opposition to Defendants’ Motion to Dismiss with Incorporated Memorandum of Law (D.E. 46) and Response in Opposition to Defendants’ Request for Judicial Notice (D.E. 47) (“Notice of Filing”). This Notice of Filing contains additional authorities that further support the arguments previously raised in Plaintiff’s Response in Opposition to Defendants’ Motion to Dismiss with Incorporated Memorandum of Law (D.E. 46) and Response in Opposition to Defendants’ Request for Judicial Notice (D.E. 47). To the extent necessary, Plaintiff intends to rely on these authorities at the December 9, 2025, hearing at 10:00 a.m. EST, during which the Court will hear oral argument on Defendants’ Motion to Dismiss the Complaint and Incorporated

Memorandum of Law (D.E. 35) and Defendants' Request for Judicial Notice (D.E. 38). Plaintiff's supplemental authorities are attached as **Composite Exhibit A** hereto and include:

1. Florida Statute § 92.38.
2. *Burch v. P.J. Cheese, Inc.*, 861 F.3d 1338 (11th Cir. 2017).
3. *Horsley v. Feldt*, 304 F.3d 1125 (11th Cir. 2002).
4. *Miami Beach First Nat. Bank v. Edgerly*, 121 So. 2d 417 (Fla. 1960).
5. *Monarch Air Group, LLC v. Journalism Development Network, Inc.*, No. 23-CV-61256-BECERRA/STRAUSS, 2025 WL 2411984 (S.D. Fla. May 19, 2025) (report and recommendation).
6. *Monarch Air Group, LLC v. Journalism Development Network, Inc.*, No. 23-CV-61256-BECERRA/STRAUSS, 2025 WL 2409766 (S.D. Fla. August 20, 2025) (order adopting report and recommendation).
7. *Purple Innovation, LLC v. Individuals, Corps., Ltd. Liab. Companies, Partnerships, & Unincorporated Associations Identified on Schedule "A"*, No. 1:24-CV-21362-DPG, 2024 WL 4652095 (S.D. Fla. Oct. 22, 2024) (report and recommendation).
8. *Purple Innovation, LLC v. Individuals, Corps., Ltd. Liab. Companies, Partnerships, & Unincorporated Associations Identified on Schedule "A"*, No. 1:24-CV-21362, 2024 WL 4652096 (S.D. Fla. Nov. 1, 2024) (order adopting report and recommendation in full).
9. *Trump Media & Technology Group Corp. v. WP Company LLC*, No. 8:23-cv-1535-TPB-AAS, 2025 WL 1615443 (M.D. Fla. June 6, 2025).

Dated December 8, 2025

Respectfully submitted,

BRITO, PLLC

2121 Ponce de Leon Boulevard

Suite 650

Coral Gables, FL 33134

Office: 305-614-4071

Fax: 305-440-4385

By: /s/ Alejandro Brito

ALEJANDRO BRITO

Florida Bar No. 098442

Primary: abrito@britopllc.com

Secondary: apiriou@britopllc.com

IAN MICHAEL CORP

Florida Bar No. 1010943

Primary: icorp@britopllc.com

Counsel for Plaintiff

President Donald J. Trump

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was filed on December 8, 2025, through the United States District Court for the Southern District of Florida's CM/ECF electronic filing system upon:

George S. Lemieux, Esq.
Timothy J. McGinn, Esq.
Eric C. Edison, Esq.
Gunster, Yoakley & Stewart, P.A.
450 E. Las Olas Blvd., Suite 1400
Fort Lauderdale, FL 33301
glemieux@gunster.com
tmcginn@gunster.com
eedison@gunster.com
dpeterson@gunster.com
pholness@gunster.com
mzayas@gunster.com
eservice@gunster.com

Katherine M. Bolger, Esq.
Davis Wright Tremaine, LLP
1251 Avenue of the Americas
21st Floor
New York, New York 10020- 1104
katebolger@dwt.com
nycdocket@dwt.com

*Counsel for Defendants Dow Jones & Company, Inc.,
d/b/a The Wall Street Journal, News Corporation,
Keith Rupert Murdoch, Robert Thomson,
Khadeeja Safdar, and Joseph Palazzolo*

By: /s/ Alejandro Brito